

John Doe v. Rick Stover, in His Official Capacity, et al.,
Civil Action No. 1:07-CV-2764-RLV (N.D. Ga.)

ATTACHMENTS TO PRETRIAL ORDER

Attachment "G-1" Objections

Defendants' Objections to Plaintiff's List of Exhibits

Official Capacity Defendants make the following objections to the exhibits listed by plaintiff and corresponding to the numbers set forth below (noting that upon receipt and review of plaintiff's trial exhibits, defendant may have additional objections):

authenticity, privilege, competency, and, to the extent possible, relevancy

1 - 6, 95 None.

7 - 104. Each of plaintiff's entries for exhibits 7 - 104 reference a single page from two volumes of documents plaintiff assembled and Bates numbered. To the extent that any of plaintiff's exhibits differ from the one page exhibit citations, defendants object on grounds that such exhibits are inadequately identified.

97 - 104. inadequately identified; once properly identified defendants may have further objection on grounds of inadequate foundation, hearsay, not relevant, prejudice exceeds probative value, composite exhibit

7 inadequate foundation, not relevant

8 inadequate foundation, not relevant

9 inadequate foundation, not relevant

10 inadequate foundation, not relevant

11 inadequate foundation, not relevant

12 inadequate foundation, not relevant

13 inadequate foundation, not relevant

14 inadequate foundation, not relevant

15 inadequate foundation, not relevant

16 inadequate foundation, not relevant

17 inadequate foundation, not relevant

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- 18 Hearsay, inadequate foundation, not relevant
- 19 - 47 inadequate foundation, not relevant
- 48 Hearsay, inadequate foundation, not relevant
- 49 Hearsay, inadequate foundation, not relevant
- 50 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, incomplete document
- 51 inadequate foundation, not relevant
- 52 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 53 inadequate foundation, not relevant
- 54 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 55 inadequate foundation, not relevant
- 56 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 57 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 58 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, incomplete document
- 59 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, authenticity
- 60 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, incomplete document, authenticity
- 61 inadequate foundation
- 62 inadequate foundation, not relevant
- 63 inadequate foundation, not relevant

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- 64 inadequate foundation, not relevant
- 65 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 66 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 67 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, incomplete document
- 68 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, incomplete document
- 69 Hearsay, inadequate foundation, not relevant
- 70 Hearsay, inadequate foundation, not relevant
- 71 Hearsay, inadequate foundation, not relevant
- 72 Hearsay, inadequate foundation, not relevant
- 73 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 74 Hearsay, inadequate foundation, not relevant
- 75 Hearsay, inadequate foundation, not relevant
- 76 Hearsay, inadequate foundation, not relevant
- 77 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value, incomplete document
- 78 Hearsay, inadequate foundation, not relevant
- 79 Hearsay, inadequate foundation, not relevant
- 80 Hearsay, inadequate foundation, not relevant, prejudice exceeds probative value
- 81 inadequate foundation, not relevant
- 82 - 94 Hearsay, inadequate foundation, not relevant
- 96 - 104 Hearsay, inadequate foundation, not relevant